

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

60 East 42<sup>nd</sup> Street • Suite 4700 • New York, New York 10165  
T: 212.792.0046 • E: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

January 16, 2024

**VIA ECF**

The Honorable Jessica G. L. Clarke, U.S.D.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: *Ruiz et al v. JHDHA, Inc. et al*  
**Case No.: 1:23-cv-07896-JGLC**

Dear Honorable Judge Clarke:

This law firm represents Plaintiff Enrique Ruiz (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves to request an extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants JHDHA, Inc. and Angel Amigon (together, the “Defendants”) from January 16, 2024 to, through and including, three (3) weeks following the entry of a Clerk’s Certificate of Default as against the Defendants.

This is the first request of its kind. If granted, this request would not affect any other Court-scheduled deadlines.

The basis for this request is that Plaintiff has recently filed an application for a Clerk’s Certificate of Default as against the Defendants.

In light of the foregoing, Plaintiff respectfully requests an extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants from January 16, 2024 to, through and including, three (3) weeks following the entry of a Clerk’s Certificate of Default as against the Defendants.

Thank you, in advance, for your time and attention to this matter.

The deadline for Plaintiff to file a motion for default judgment is EXTENDED to **February 6, 2024**. Plaintiff is reminded that, per the Court’s Individual Rules, requests for extensions must be made at least 48 hours prior to the deadline. SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge

Dated: January 17, 2024

VIA ECF: All Counsel

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi, Esq.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, New York 10165  
Tel. No.: (212) 792-0048  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)  
*Attorneys for Plaintiff*